

<i>SERFF Tracking Number:</i>	<i>AERS-126179832</i>	<i>State:</i>	<i>Arkansas</i>
<i>Filing Company:</i>	<i>RiverSource Life Insurance Company</i>	<i>State Tracking Number:</i>	<i>42594</i>
<i>Company Tracking Number:</i>	<i>0146IDS01-47-ADV</i>		
<i>TOI:</i>	<i>L09I Individual Life - Flexible Premium</i>	<i>Sub-TOI:</i>	<i>L09I.001 Single Life</i>
	<i>Adjustable Life</i>		
<i>Product Name:</i>	<i>AdvanceSource</i>		
<i>Project Name/Number:</i>	<i>AdvanceSource/AdvanceSource</i>		

Filing at a Glance

Company: RiverSource Life Insurance Company

Product Name: AdvanceSource	SERFF Tr Num: AERS-126179832	State: Arkansas
TOI: L09I Individual Life - Flexible Premium	SERFF Status: Closed-Filed-	State Tr Num: 42594
Adjustable Life	Closed	
Sub-TOI: L09I.001 Single Life	Co Tr Num: 0146IDS01-47-ADV	State Status: Filed-Closed
Filing Type: Form		Reviewer(s): Linda Bird
	Author: Hazel Delane	Disposition Date: 06/15/2009
	Date Submitted: 06/07/2009	Disposition Status: Filed-Closed
Implementation Date Requested: On Approval		Implementation Date:

State Filing Description:

General Information

Project Name: AdvanceSource	Status of Filing in Domicile: Pending
Project Number: AdvanceSource	Date Approved in Domicile:
Requested Filing Mode: Review & Approval	Domicile Status Comments: Form being filed simultaneously with Minnesota which is the state of domicile.
	Market Type: Individual
	Group Market Size:
	Group Market Type:
	Explanation for Other Group Market Type:
	State Status Changed: 06/15/2009
	Created By: Hazel Delane
	Corresponding Filing Tracking Number:
	0146IDS01-47-ADV

Filing Description:

RE: RiverSource Life Insurance Company
NAIC No.: 65005 FEIN No.: 41-0823832

Individual Life Insurance Forms Filing

Form ----- Description

291251 D (7/09-----AdvanceSource Accelerated Benefit (Marketing Brochure)

SERFF Tracking Number:	AERS-126179832	State:	Arkansas
Filing Company:	RiverSource Life Insurance Company	State Tracking Number:	42594
Company Tracking Number:	0146IDS01-47-ADV		
TOI:	L09I Individual Life - Flexible Premium	Sub-TOI:	L09I.001 Single Life
	Adjustable Life		
Product Name:	AdvanceSource		
Project Name/Number:	AdvanceSource/AdvanceSource		

Dear Sir or Madam:

Milliman, Inc. is submitting the above-referenced advertising form on an informational filing basis. Milliman, Inc. is submitting this filing on behalf the RiverSource Life Insurance Company ("the Company"). A letter from the Company authorizing Milliman to conduct this filing is included with this submission.

Form 291251 D (7/09) is the advertising brochure that will be used for marketing rider form series 132172, Accelerated Benefit Rider for Chronic Illness. "AdvanceSource" is the marketing name for form series 132172. The Company may change the photographs, pictures, logos, font size, colors, and format of the brochure. However, the text language indicated in enclosed form series 132172 will not be changed without submitting the revised form copy to the Department. The form is new and does not replace any previously approved forms. The form contains no unusual or controversial features or language that deviate from normal insurance industry standards.

Rider Form Series 132172, Accelerated Benefit Rider for Chronic Illness, is an individual long term care insurance rider. It is an optional rider and will be sold and issued with approved universal life and variable universal life policies. The rider provides for accelerated payments of the life death benefit to pay for qualified Long Term Care services incurred by the insured person. The rider form has already been approved by the Department; please refer to SERFF Tracking Number AERS-126110760. The rider form will be marketed to the general public in the individual life market by the Company's licensed agents.

The filing fee of \$25 is being submitted via EFT.

We greatly appreciate your assistance and prompt review of this filing submission. If you have any questions, or need any additional information to complete your review, please do not hesitate to call me collect at (312) 499-5728.

Sincerely,

Hazel J. Delane
Compliance Consultant
Milliman, Inc.

Company and Contact

Filing Contact Information

Hazel Delane, hazel.delane@milliman.com

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 Adjustable Life
 Product Name: AdvanceSource
 Project Name/Number: AdvanceSource/AdvanceSource

Milliman Inc. 312-499-5728 [Phone]
 Two Conway Park, 150 Field Drive, Suite 180 847-604-8671 [FAX]
 Lake Forest, IL 60045

Filing Company Information

RiverSource Life Insurance Company CoCode: 65005 State of Domicile: Minnesota
 9550 Ameriprise Financial Center, H22/9550 Group Code: 4 Company Type: Life
 Minneapolis, MN 55474 Group Name: State ID Number:
 (612) 671-2465 ext. [Phone] FEIN Number: 41-0823832

Filing Fees

Fee Required? Yes
 Fee Amount: \$25.00
 Retaliatory? Yes
 Fee Explanation: 1 Advertising form x \$50 = \$50
 Per Company: No

COMPANY	AMOUNT	DATE PROCESSED	TRANSACTION #
RiverSource Life Insurance Company	\$25.00	06/07/2009	28419353

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<i>Product Name:</i>	<i>AdvanceSource</i>		
<i>Project Name/Number:</i>	<i>AdvanceSource/AdvanceSource</i>		

Correspondence Summary

Dispositions

Status	Created By	Created On	Date Submitted
Filed-Closed	Linda Bird	06/15/2009	06/15/2009

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	<i>Adjustable Life</i>		
<i>Product Name:</i>	<i>AdvanceSource</i>		
<i>Project Name/Number:</i>	<i>AdvanceSource/AdvanceSource</i>		

Disposition

Disposition Date: 06/15/2009

Implementation Date:

Status: Filed-Closed

Comment:

Rate data does NOT apply to filing.

SERFF Tracking Number:	AERS-126179832	State:	Arkansas
Filing Company:	RiverSource Life Insurance Company	State Tracking Number:	42594
Company Tracking Number:	0146IDS01-47-ADV		
TOI:	L09I Individual Life - Flexible Premium Adjustable Life	Sub-TOI:	L09I.001 Single Life
Product Name:	AdvanceSource		
Project Name/Number:	AdvanceSource/AdvanceSource		

Schedule	Schedule Item	Schedule Item Status	Public Access
Supporting Document	Flesch Certification		No
Supporting Document	Application		No
Supporting Document	Health - Actuarial Justification		No
Supporting Document	Outline of Coverage		No
Supporting Document	Authorization Letter		No
Form	AdvanceSource Accelerated Benefit		No

SERFF Tracking Number:	AERS-126179832	State:	Arkansas
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TOI:	L09I Individual Life - Flexible Premium Adjustable Life	Sub-TOI:	L09I.001 Single Life
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Form Schedule

Lead Form Number: 291251 D (7/09)

Schedule Item Status	Form Number	Form Type	Form Name	Action	Action Specific Data	Readability	Attachment
	291251 D (7/09)	Advertising	AdvanceSource Accelerated Benefit	Initial		0.000	291251 D (7-09) _AdvanceSou rce Accelerated Benefit_Broch ure_05-22- 09_Final_060 9_.pdf

AdvanceSourceSM accelerated benefit



A solution offering much more than life insurance.



- > More than 70% of the U.S. population over age 65 will need some type of long-term care services.

Source: U.S. Department of Health and Human Services, 2008

Life insurance can provide financial protection for those who matter most. Planning for long-term or chronic care needs can help maintain your future standard of living.

One comprehensive solution can give you the flexibility to address both: a *RiverSource*® permanent single-life insurance policy combined with the *AdvanceSource*™ accelerated benefit.

The optional *AdvanceSource* rider,¹ available for an additional cost,² may be a good choice for you whether you are considering long-term care insurance or want an additional safety net to help pay for expenses related to chronic care needs.³ With this rider, you have the option to accelerate a portion of the death benefit to help pay for expenses should you become chronically ill.^{4, 5}

By choosing to add the *AdvanceSource* rider to your life insurance policy, you'll be able to:

- > **Protect** yourself and those who matter most.
- > **Preserve** assets from the cost of chronic care.
- > **Customize** coverage that's right for you.

¹ Unlike some traditional long-term care policies, the *AdvanceSource* rider does not offer unlimited benefits. The benefit limits for this rider are selected at time of application for the life insurance policy and may not exceed the Health Insurance Portability and Accountability Act (HIPAA) limits. If chronic care needs extend beyond this amount, you should ensure you have other means to address these costs.

² The cost for the rider is based on gender, age, rider specified amount, time since issue, percentage selected for monthly benefit amount, and risk class.

³ Chronic care expenses are expenses for qualified long-term care services.


⁴ Chronically ill generally means an individual is unable to perform two out of six activities of daily living without substantial assistance from another individual for at least 90 days, or needs substantial supervision due to cognitive impairment.

⁵ When the policy's death benefit is accelerated for chronic care expenses, the death benefit and the cash value are reduced proportionately.



Kent, age 44, and Debra, age 45, have two teenage children and an annual income of \$186,000. Kent makes the maximum annual contribution to his 401(k) retirement account — the current value of which totals \$198,000. They have excellent cash flow but limited savings options.

Kent and Debra want to purchase additional life insurance and save more for retirement to protect their dreams. They understand the need for chronic care coverage but are concerned about paying for it over many years, especially because they want to retain some financial flexibility.



Add protection for yourself and those who matter most with one solution.

A *RiverSource* permanent life insurance policy with the *AdvanceSource* rider allows you to accelerate a portion of your death benefit to pay for qualified chronic care expenses and offers you:

- > **Protection** — You can leave a death benefit for survivors and cover your chronic care expenses with potentially income-tax-free benefits.¹ If you already own long-term care insurance, you can use the *AdvanceSource* rider to provide supplemental protection.
- > **Convenience** — One policy can cover both life insurance and chronic care expenses. If your situation changes, you have the flexibility to reduce your coverage or take the *AdvanceSource* rider off your policy. If you are able to live independently throughout your lifetime and do not need the benefits from the rider — the entire death benefit of the life insurance policy goes to your designated beneficiary.

Upon the recommendation of their financial advisor, Kent purchases a \$750,000 *RiverSource* Variable Universal Life IV insurance policy. He plans to continue funding the policy until his retirement at age 65. He adds the *AdvanceSource* rider for up to 90% of the death benefit with a 2% monthly benefit limit.

This solution offers Kent and Debra the control and flexibility they choose. The death benefit will protect the family should Kent die during his career. If needed, Kent also has a maximum monthly benefit of \$13,500 for 50 months to pay for chronic care expenses. Variable life insurance is a complex investment vehicle that is subject to market risk, including the potential loss of principal invested.

¹ The *AdvanceSource* benefit is intended to qualify for exclusion from income within the limits of the Internal Revenue Code in effect at the issuance of the rider. Receipt of the benefit may be taxable.



Eric, age 53, and Eileen, age 52, are planning ahead and hope to protect their assets and income for uses other than chronic care. Eric is employed and contributes the maximum amount to his 401(k) retirement account, which is worth \$910,000. The couple also has other savings and owns a \$700,000 home. Eileen purchased a long-term care policy two years ago, but Eric has no long-term care insurance and only has group term life insurance.

To live out their dreams, the couple wants to make sure Eric has chronic care protection in place to safeguard their assets set aside for retirement. They also want to provide for Eileen should she outlive Eric.



Preserve assets from costly chronic care expenses.

Studies show an average cost for a nursing home stay is more than \$75,000 annually.¹ The *AdvanceSource* rider can help pay for chronic care expenses and help you:

- > **Protect other assets from depletion** — With the appropriate coverage, you won't have to access resources that may not be readily converted into cash, are earmarked for retirement or may trigger tax consequences.
- > **Keep your investments on track** — You can keep your investments and savings in the market and working toward your long-term financial objectives without having to use them for chronic care expenses.
- > **Leave a larger estate to your loved ones** — You can preserve your estate instead of substantially reducing it to pay for chronic care expenses.

Eric and Eileen consult with a financial advisor and, for Eric, purchase a \$500,000 **RiverSource Foundations**® universal life insurance policy with the *AdvanceSource* rider for up to 70% of the death benefit with a 1% monthly benefit limit. They pay the premium with discretionary income.

This solution will give Eric and Eileen several options, depending on their future circumstances. They can access the cash value if needed or accelerate up to 70% of the death benefit over time should Eric need chronic care services. The maximum monthly benefit available to Eric would be \$3,500 for 100 months. The remaining 30% of the death benefit would be left to the beneficiary of the life insurance policy. It is important to remember withdrawals and loans reduce the death benefit of the life insurance policy and can cause the policy to lapse.²

¹ \$76,285 for a private room and \$68,255 for a semi-private room in 2007. U.S. Department of Health and Human Services, 2008

² Loans are generally not taxable, however there may be tax consequences if the policy lapses or is surrendered with a loan (even as part of a 1035 exchange). The taxable income from the surrender, 1035 exchange or lapse of the policy may exceed the cash proceeds received from it. Withdrawals are generally taxable to the extent they exceed basis in the policy. If the policy is a modified endowment contract (MEC), pre-death distributions, including loans from the policy, are taxed on an income-first basis, and there may also be a 10% federal income-tax penalty for distributions prior to age 59½.



Edward, age 68, is a widower who takes retirement income from a pension, Social Security and qualified savings. Nine years ago, he purchased a long-term care policy with a two-year benefit limit.

Among his retirement dreams, Edward wants to continue his current lifestyle and provide an inheritance for his children and grandchildren, but is concerned his long-term care policy may not provide all the protection he needs.

Customize coverage to help meet your unique needs.

The *AdvanceSource* rider gives you the control and flexibility to choose the amount of coverage that's right for you:

1. **Choose how much of your death benefit to use** — At application you can elect to accelerate over time 20% to 90% of the death benefit toward chronic care expenses, leaving the remaining death benefit amount to your heirs.
2. **Select your monthly benefit limit** — You can choose a monthly benefit limit of 1%, 2% or 3% of your selected accelerated death benefit amount, helping you control the duration of benefits based on your personal chronic care needs.
3. **Elect how to pay your premium** — You can pay for both the life insurance and the *AdvanceSource* rider in a lump sum or through regular payments over time.

After consulting with a financial advisor, Edward purchases a **RiverSource Foundations Protector®** universal life policy with the *AdvanceSource* rider. He chooses a death benefit of \$285,000 and the *AdvanceSource* rider for up to 80% of the death benefit with a 3% monthly benefit limit. This election would give Edward a maximum monthly amount of \$6,840 for 33 months if he chooses to accelerate this benefit. Edward uses a portion of a CD to pay a one-time premium that will keep the policy's no-lapse guarantee¹ in force for life.

This solution will give Edward additional, more affordable chronic care protection beyond the terms of his existing long-term care policy. Any portion of the death benefit he does not use for chronic care expenses he can leave as a potentially income-tax-free inheritance for his family.

All guarantees are based on the continued claims-paying ability of the issuing company.

Before you purchase, be sure to ask your financial advisor about the life insurance policy's features, benefits, risks and fees, and whether the life insurance is appropriate for you, based upon your financial situation and objectives.

¹ For *Foundations Protector* universal life, the no-lapse guarantee is called Coverage Protection in Illinois.

Hypothetical example for illustrative purposes only.

Here's an example of how the *AdvanceSource* rider works:

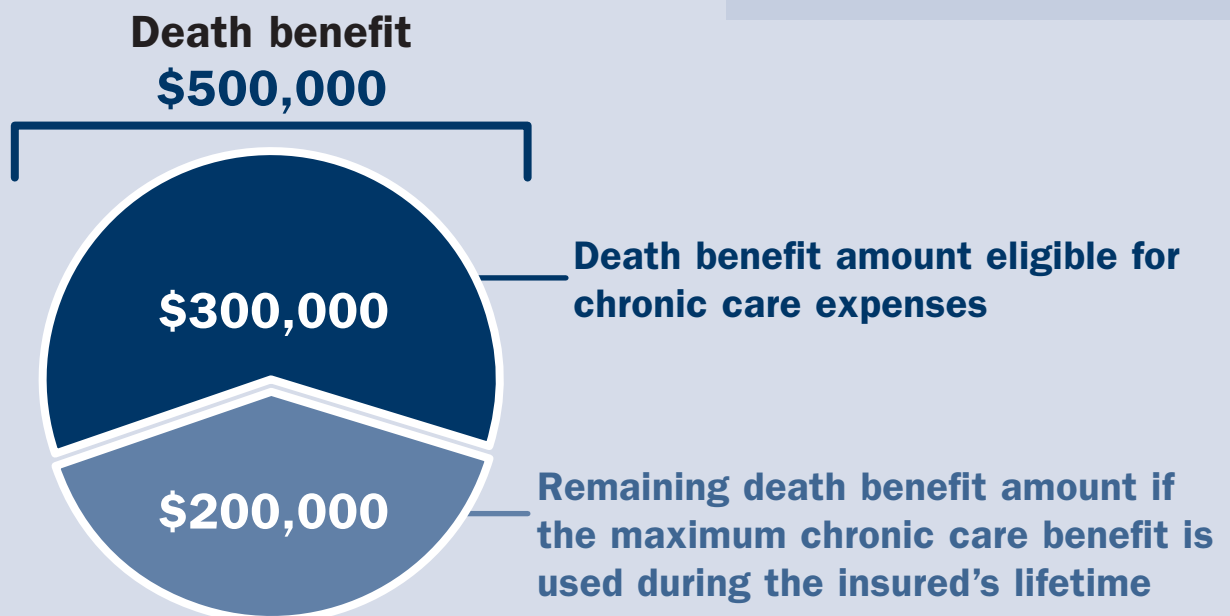
Death benefit selected	<u>\$500,000</u>
Percent allocated for chronic care needs	<u>x 60%</u>
<i>AdvanceSource</i> benefits available for chronic care needs	<u>= \$300,000</u>



Monthly <i>AdvanceSource</i> benefits percentage	<u>x 2%</u>
Maximum monthly benefit	<u>= \$6,000</u>
Number of months maximum benefit lasts	<u>50 months</u>

In this example, benefits are payable up to the monthly maximum of \$6,000. However, if the insured requests less than the monthly maximum in any given month, benefits will continue into future months until the rider maximum specified amount has been reached.

Since chronic care needs may extend beyond the maximum amount specified for this rider, it is important to have alternatives to address these costs.



Hypothetical example for illustrative purposes only.

Qualifying for *AdvanceSource* benefits

To be eligible for the *AdvanceSource* benefits, a licensed health care practitioner must certify an individual is chronically ill and currently on a prescribed plan of care within the previous 12 months. Chronically ill generally means an individual is unable to perform two out of six activities of daily living¹ without substantial assistance from another individual for at least 90 days, or needs substantial supervision due to cognitive impairment.

Working with your medical providers, you will be able to choose the qualified chronic care services² that work best for you, including:

- > **Long-term care facilities or nursing homes**
- > **Adult day-care centers**
- > **Assisted-living facilities³**
- > **In-home care services**

You have the flexibility to use some or all of your accelerated death benefit to pay for chronic care expenses. Benefit payments will go directly to the insured and will continue as long as the insured has eligible care needs, up to the accelerated death benefit amount specified at time of application for the life insurance policy.

At death, the beneficiaries will receive, potentially income-tax free, the unused balance of the insured's death benefit — the death benefit amount less any accelerated death benefit used for chronic care.

Generally benefits for chronic care services are non-taxable up to the designated IRS limits. Consult your personal tax advisor for advice.



> **Contact your financial advisor**

The *AdvanceSource* rider with a permanent life insurance policy provides a comprehensive solution to address your protection needs.

Talk with your financial advisor today about how the *AdvanceSource* rider may be right for you. Together with your financial advisor, review your financial situation along with the Outline of Coverage, which provides additional details about the rider, including rider cost, benefit conditions, limitations and exclusions.

¹ Activities of daily living means the following activities: bathing, continence, dressing, eating, toileting and transferring.

² Qualified chronic care services means the necessary diagnostic, preventative, therapeutic, curative, treatment, mitigation, and rehabilitative services and maintenance or personal care services that are required by a chronically ill individual and provided pursuant to a plan of care prescribed by a licensed health care practitioner.

³ In California, the *AdvanceSource* rider provides coverage for care received in a residential care facility.

This brochure is authorized for use only when accompanied by the Outline of Coverage and one of the following RiverSource permanent life insurance brochures: *Foundations Protector* universal life insurance, *Foundations* universal life insurance or Variable Universal Life IV.

You should consider the investment objectives, risks, charges and expenses of variable life insurance and the underlying investment options carefully before investing. For a free copy of the life insurance prospectus and underlying investment's prospectus, which contains this and other information about variable life insurance, call 1 (800) 333-3437. Read the prospectus carefully before you invest.

Neither RiverSource Life Insurance Company, RiverSource Life Insurance Co. of New York nor their representatives provide tax or legal advice. Consult with an independent and qualified tax or legal advisor concerning your situation.

The *AdvanceSource* rider is not considered long-term care insurance in some states.

This brochure applies to the following rider and policy form number series: *AdvanceSource* rider, 138751; *Foundations Protector* universal life insurance, 133078, 133078 A with endorsement 132164; *Foundations* universal life insurance, 30080 C with endorsement 133080; Variable Universal Life IV, 30061. In New York, it applies to: *AdvanceSource* rider, 138751; *Foundations Protector* universal life insurance, 139056 A with endorsement 138744; *Foundations* universal life insurance, 39080D, Variable Universal Life IV, 39061.

This rider is intended to be federally tax-qualified Long-Term Care insurance under Section 7702B(b) of the Internal Revenue Code of 1986, as adopted by the Health Insurance Portability and Accountability Act of 1996 – Public Law 104-191 (herein referred to as the “Code”), and as amended from time to time.

The benefit is intended to qualify for exclusion from income within the limits of the Code in effect at the issuance of this rider. Receipt of benefits in excess of those limits may be taxable. Consult a tax advisor regarding the taxation of any benefits received. Charges for this rider may be considered distributions for income tax purposes, and may be taxable.

The *AdvanceSource* rider is not available in all states.

The *AdvanceSource* accelerated benefit rider is called the *AdvanceSource* long-term care rider in Kansas.

In New York, this product is a life insurance rider that accelerates the death benefit for qualified long-term care services and is not a health insurance policy providing long-term care insurance subject to the minimum requirements of New York law, does not qualify for the New York State Long Term Care Partnership program and is not a Medicare supplement policy.

In New York, receipt of accelerated death benefits may affect eligibility for public assistance programs such as medical assistance (Medicaid), Aid to Families with Dependent Children and Supplemental Security Income.



RiverSource Life Insurance Company
968 Ameriprise Financial Center
Minneapolis, MN 55474

RiverSource Life Insurance Co. of New York
20 Madison Ave. Extension
P.O. Box 5144
Albany, NY 12205

RiverSource Distributors, Inc. (Distributor), Member FINRA. Insurance and annuity products are issued by RiverSource Life Insurance Company and in New York, by RiverSource Life Insurance Co. of New York, Albany, New York. These companies are affiliated with Ameriprise Financial Services, Inc. Only RiverSource Life Insurance Co. of New York is authorized to sell insurance and annuities in New York.

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Supporting Document Schedules

		Item Status:	Status Date:
Bypassed - Item:	Flesch Certification		
Bypass Reason:	N/A		
Comments:			

		Item Status:	Status Date:
Bypassed - Item:	Application		
Bypass Reason:	N/A		
Comments:			

		Item Status:	Status Date:
Bypassed - Item:	Health - Actuarial Justification		
Bypass Reason:	N/A		
Comments:			

		Item Status:	Status Date:
Bypassed - Item:	Outline of Coverage		
Bypass Reason:	N/A		
Comments:			

		Item Status:	Status Date:
Satisfied - Item:	Authorization Letter		
Comments:			
Attachment:			
	RiverSource_Authorization Letter.pdf		

RiverSource Life Insurance Company
RiverSource Distributors, Inc.
9550 Ameriprise Financial Center
Minneapolis, MN 55474



March 16, 2009

Ms. Hazel J. Delane
Compliance Consultant
Milliman, Inc.
Two Conway Park
150 Field Drive, Suite 180
Lake Forest, IL 60045

Re: State Insurance Filings

Dear Ms. Delane:

This letter will serve as authorization from RiverSource Life Insurance Company for employees of Milliman, Inc. to file product forms and respond to inquiries on our behalf with state insurance departments and jurisdictions where RiverSource Life Insurance Company is authorized to do business.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Gorham".

Mark Gorham
Vice President, Insurance Product Development
RiverSource Life Insurance Company